## Annual 47 C.F.R § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date Filed: March 1, 2010

Name of company covered by this certification: Brikan Networks LLC

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## Accompanying Statement to Annual Certification

At Brikan Networks LLC ("Brikan") we recognize the importance of our customer's privacy and take measures needed to keep all Customer Proprietary Network Information ("CPNI") safe and secure.

Brikan limits the access to CPNI to only necessary personnel. Access to CPNI is kept within Brikan accounting and information technology departments. Only employees having a business purpose for access can view CPNI. Company policy provides that CPNI is not distributed, shared or published unless specifically requested by the customer. Any company use of CPNI for outbound marketing is handled and tracked solely by the executive management team. Brikan personnel with access to CPNI are trained bi-annually on the handling of CPNI to ensure proper handling measures are taken. Violations of company policy related to CPNI are grounds for termination.

Brikan maintains all physical hardware holding CPNI in a secure location with limited access. Only executive management has access to the physical hardware housing CPNI. Information on our equipment is protected by a combination of hardware and software firewalls incorporating encryption and unique secure passwords. Electronic logs showing date, time, login name and location of any electronic access to equipment holding CPNI. These logs are reviewed monthly by executive management for any unauthorized transfer or access to CPNI.

Brikan is a relatively small carrier with limited resources and maintains a simple database to track customer CPNI status and current service subscriptions. This database clearly identifies the subscriptions of the customer and their CPNI approval status. Brikan executive management holds quarterly meetings to discuss the current procedures and the relative effectiveness including any proposed changes to the processes and procedures in the handling of CPNI.

Records pertaining to the access, use and compliance with rules governing CPNI are maintained for a period of at least one (1) year.



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